

Before the
FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

Reply Comments In the Matter of)
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The Development of Operational,)
Technical and Spectrum Requirements)
for Meeting Federal, State and Local)
Public Safety Communications)
Requirements Through the Year 2010)
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WT Docket No. 96-86

Reply Comments of the
Region 24 (Missouri) 700 MHz Regional Planning Committee
Hereby Submitted July 6, 2006

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Region 24 requests the Commission consider adding 700 MHz A and B blocks to this 700 MHz broadband proceeding to improve public safety capabilities for current and future broadband implementation.

The introduction of the 700 MHz A and B block spectrum into this proceeding is critical to the establishment of an effective 700 MHz public safety band plan as the A and B block licensees themselves have gone on record requesting the Commission revisit the location of their spectrum in the band. Based on advances in technology and opportunities that can allow more cost effective broadband implementation, the re-alignment of the 700 MHz band will provide maximum benefit to the 700 MHz users. Locating the A and B block spectrum within public safety's allocation and immediately adjacent to commercial spectrum can allow for the development of

shared regional communication systems in which public and private partnerships bring new opportunities to all users.

We believe that if the 700 MHz band is ever to contribute to public safety broadband data development and truly reach its maximum potential as the voice and data public safety workhorse it was originally envisioned as consisting of 51% of the entire public safety radio spectrum and being operationally and technically compatible with more than 20 % of the remainder, the consolidation of the public safety narrowband portion and the optimization of the public safety 700 MHz band promoting broadband usage will eventually occur. The current band configuration will be re-evaluated over time and eventually an alteration of the allocation will be necessary in the name of spectrum efficiency and in the promotion of more effective and efficient technologies. Should such an instance occur in the future where narrowband consolidation is determined to be necessary, it is probable that public safety will be faced with moving a much larger number of users to accommodate a consolidated narrowband plan than they would today and it is also possible that in such a process public safety will not gain access to the additional spectrum as proposed in the Access Spectrum Optimization Proposal. Eventually, a change in the 700 MHz allocation will be necessary to meet the demands of public safety and to get more capacity out of public safety's communication resources. We urge the Commission to consider all opportunities in this proceeding, including the A and B block 700 MHz spectrum.

We are aware of obstacles that have been identified with narrowband 700 MHz consolidation, specifically the US Canadian border 700 MHz band arrangement in which only half of the 24 MHz of public safety spectrum is being cleared by broadcasters from 700 MHz narrowband consolidation, specifically TV channels 63/68. The Optimization Plan calls for moving the majority of the public safety narrowband allocation into the TV channel 64/69 portion of the band, thereby seriously limiting 700 MHz deployments today along the US Canadian border. We encourage the Commission to expeditiously investigate these concerns and determine if they can be resolved as no narrowband consolidation can take place nationally until this issue is rectified. We support 700 MHz development in regions that operate along the US Canadian border and we must keep their capabilities of today in perspective when planning for future broadband potential in the 700 MHz band.

Another consequence that has been identified as an obstacle to 700 MHz narrowband consolidation is the cost associated with developing software and reprogramming 700/800 MHz radios currently deployed in the field. While the number of these radios in the field can be estimated, a small percentage of these radios are utilizing their 700 MHz capabilities and most are being utilized in existing 800 MHz radio systems. Coincidentally, most of these radios are already going to experience some reprogramming during the 800 MHz re-banding process,

so there may be opportunities in the coming months to reprogram the 700 MHz portion of these radios as well. While modifying the program in these radios is important, the cost estimates vary and do not take into account the fact that many of these radios will experience reprogramming regardless of any 700 MHz narrowband consolidation. The Commission must address this issue before any narrowband consolidation can take place. Again, the Commission should resolve this issue while keeping planning for future public safety capabilities in the forefront.

Region 24 supports the principles behind 700 MHz public safety narrowband consolidation and the concept of public/private spectrum sharing and system development to assist public safety in achieving cost effective broadband data capabilities through data sharing arrangements between public safety and commercial 700 MHz licensees, despite identified obstacles to such 700 MHz narrowband consolidation.

Given recent proposals addressing public safety communications capabilities from a national scope, the future for public safety communications may change quicker than many expect. It can in the future evolve from today's paradigm in which individual channels are dedicated to agencies for their use in independent radio systems while they strive for a degree of inter-agency, inter-system interoperability

to one in which agencies instead coordinate their use by *gaining access* to hardened, prioritized wide area regional networks. For shared systems to work for public safety, the partnerships must agree on developing robust, redundant radio networks that can compliment any system sharing agreement that may be developed. Public safety may eventually favor the wide reaching capabilities associated with the coordination of the communications of agency personnel over shared networks compared to the benefits provided by independently created and channelized networks. The potential of national interoperability associated with public safety's participation in shared regional and national networks and the dynamic response of public safety users permitted to both man made and natural disasters cannot be underestimated. Region 24 feels that striving to arrive at the most efficient use of this spectrum is important towards the development of any future public safety system. We feel the Commission should look ahead and make decisions that accommodate what public safety's future capabilities and requirements appear to be, rather than base any decision wholly on what is desired by the users in the band today.

In closing, we thank the Commission for allowing an open forum for comment on these important issues regarding future 700 MHz use and public safety's migration towards broadband data capabilities and applications. We look forward to working with the Commission in the future to promote public safety communications.

STEPHEN T. DEVINE, CHAIRPERSON

Region 24 (Missouri) 700 MHz Regional Planning Committee

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